

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

<p>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</p>	<p>MDL No. 2875</p>
<p>THIS DOCUMENT RELATES TO ALL CASES</p>	<p>HON. ROBERT B. KUGLER</p>

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Eric Abraham, Esq.**
Hill Wallack LLP
21 Roszel Road
Princeton, New Jersey 08540

Attorneys for Defendants Hetero Labs Limited and Hetero Drugs, Limited (hereinafter “Defendants”).

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Panchakshari Nanyappa Gowda, Associate Vice President, Head-Quality, on May 4–6, 2021, at 7:00 a.m. pacific standard time, and continuing until completion, at Hill Wallack LLP, 21 Roszel Road, Princeton, New Jersey 08540, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

April 29, 2021

PLAINTIFFS' CO-LEAD COUNSEL

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EXHIBIT A

30(B)(6) TOPICS

Testing

2. The cause of the contamination of HLL's valsartan finished dose with nitrosamines, including, but not limited to, NDMA and NDEA.
4. The root cause investigation for the nitrosamine impurities, including NDMA and NDEA in the HLL valsartan finished dose.
16. The chromatogram and mass spectrometry results for all testing by HLL or its agents of the solvents utilized in the manufacture of HLL's valsartan finished dose.
18. The chromatogram and mass spectrometry results for all testing by any entity or person other than HLL or its agents but known to HLL, of the solvents utilized in the manufacture of HLL's valsartan finished dose.
21. HLL's SOPs/policies/procedures intended to prevent, detect, or act in response to any carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, in connection with the manufacture and contents of HLL's valsartan finished dose.
31. HLL's evaluation and knowledge of the health risks of nitrosamines including NDMA and NDEA, including but not limited to as a contaminant of HLL's valsartan finished dose.
37. HLL's oral and written statements to finished dose manufacturers, wholesalers, retailers, and consumers with regard to the contents and purity of HLL's valsartan finished dose.
42. HLL's compliance or non-compliance with cGMPs intended to prevent, detect, or act in response to any carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, as it relates to the manufacture, quality assurance, quality control, and sale of HLL's valsartan finished dose.
44. The policies, practices, procedures and trainings for monitoring compliance with cGMPs intended to prevent, detect, or act in response to any carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, in the manufacture, quality assurance, quality control, and sale of HLL's valsartan finished dose.

EXHIBIT B
DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Panchakshari Nanyappa Gowda.
2. The complete production of Panchakshari Nanyappa Gowda's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL
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